CHAPTER 5 – CONSULTATION AND COORDINATION

5.1 PUBLIC PARTICIPATION PROCESS

Initiation of the EIS process and the public scoping meetings were announced through the Federal Register, BLM media releases, direct mailings, and postings on the BLM Project website. These activities are described below.

5.1.1 Federal Register Notice of Intent

The BLM Federal Register Notice of Intent, published on September 1, 2011 (Volume 76, Number 170, Pages 54483-54484), marked the beginning of the public scoping period for the Project Supplemental EIS/PRMPA. The 60-day scoping period was announced as ending on October 31, 2011. Three scoping meetings were held from September 27 through September 29, 2011. Comments received during the scoping period are summarized in Appendix C.

5.1.2 Media Release

The BLM prepared a media release to introduce the Project, announce the initial scoping meetings, and invite the public to provide input. The news release was issued on September 1, 2011 to local and regional newspapers, congressional offices, television stations, and radio stations.

In addition, paid advertisements were published in the following local newspapers:

- Las Vegas Review-Journal—advertisements published on September 12, 13, and 14, 2011
- Pahrump Valley Times—advertisement published on September 14, 2011

5.1.3 Direct Mailings

A public scoping notice was prepared and mailed to inform the public about the scoping process for the preparation of the Supplemental EIS/PRMPA and the scheduled scoping meetings. The public was invited to participate in the scoping process and to share any concerns or comments, submit information, and identify issues to be addressed during the Supplemental EIS/PRMPA process.

The notice was mailed to federal, state, and local agencies; elected officials; Native American tribes; special interest groups and organizations; and the general public, during the week of September 7, 2011. The distribution list included 1,071 notices, and was compiled from a list of individuals, organizations, and agencies who had expressed interest in other BLM LVFO projects.

5.1.4 Public and Agency Scoping Meetings

The BLM held three public scoping meetings to identify issues and concerns regarding the proposed Project. These scoping meetings provided an opportunity for the public to learn about the proposed Project and to provide comments. Meeting locations, dates, and times are provided in Table 5-1.

Location	Date	Time	Attendance*
Primm, NV	September 27, 2011	6:00-8:00 PM	7
Las Vegas, NV	September 28,2011	6:00-8:00 PM	30
Jean, NV	September 29,2011	6:00-8:00 PM	6
		Total	43
*These counts reflect only those attendees who elected to sign in at the door.			

Table 5-1. Public Scoping Meetings

At each meeting, attendees were greeted at the entrance and asked to provide contact information on meeting sign-in sheets. Attendees were informed about the meeting format and given a public scoping fact sheet and a comment form. In addition, attendees were informed about ways to submit comments to the BLM and were informed about the flow of information on the display boards in the room.

The meeting format included an open house period, followed by a brief presentation of the proposed Project and NEPA process. During the open house period, representatives from the BLM; Silver State Solar, LLC; AMEC; and EPG were available to answer questions about the proposed Project and explain the NEPA process. A court reporter was present at all meetings to document the comments made. Each of the meetings began with a statement by the moderator who provided an overview of the proposed Project and the goals and objectives of the NEPA process, followed by brief statements from the BLM describing BLM roles and responsibilities.

During the public scoping, members of the public were provided a separate comment form if they wanted to make an oral comment during the meeting. Commenters were called in the order of comments received and were asked to limit their comments to three to five minutes to allow all those who wished to speak time to do so.

5.1.5 Scoping Response

During the public scoping period (September 1 through October 31, 2011), a total of 59 comment documents were received. A comment document is defined as an oral comment recorded as part of a public scoping transcript, email, fax, letter, or comment form. Because some comment documents had more than one comment, the total number of comments received is greater than the number of comment documents.

5.1.5.1 Issues Identified During Scoping

Comments were categorized by primary topic, regardless of the position of the comment towards the topic. Most comments addressed more than one category, or topic; these comments were categorized by the driving topic unless the associated topics were of equal importance to the issue being presented, in which case the comment was placed under both categories. This form of analysis allows for specific comments to be captured and grouped by general topic or resource issue.

The following subsections are identified by resource or topic and include a summary of public and agency comments received during the scoping period. Preliminary issues, concerns, and opportunities are summarized within each resource or topic subsection to be addressed in the Draft Supplemental EIS/PRMPA.

NEPA PROCESS

- Commenters expressed concern that they were not properly notified of the scoping meeting dates, times and locations.
- One commenter stated that through the NEPA process they would like to see the development of mitigation by this Project for the loss of mitigation actions previously funded by Clark County for non-federal actions covered by an incidental take permit.
- Respondents requested additional information about the reasons for an RMP amendment.

<u>ALTERNATIVES</u>

- One commenter stated that a "conservation alternative" should be the preferred alternative. The "conservation alternative" would preclude siting the Project in the proposed ROW area and would preclude any further development of BLM lands in the Ivanpah Valley.
- Respondents requested that the "no action" alternative be implemented on the Project.
- Commenters stated that other BLM administered lands such as the Apex Valley, the Eldorado Valley, the Ivanpah Valley across the California border, and the Nevada portion of the Ivanpah Valley on the west side of I-15 should be considered as alternative locations for the Project.
- Commenters stated that the Project should be relocated to more urbanized, degraded, contaminated, disturbed sites such as nearby private lands, brownfields, existing rooftops in the Las Vegas area, fallow or abandoned agricultural lands, and undeveloped parcels within the urban areas of Clark County.
- One commenter stated that the Supplemental EIS/PRMPA should describe how each alternative was developed, how it addresses each project objective, and how it will be implemented.

■ Commenters stated that they were in favor of renewable energy, just not at the proposed location.

AIR QUALITY

- One commenter expressed specific concern about two causes of air quality concerns: vehicle traffic and combustion emissions from equipment and dust control due to the method of site preparation.
- A respondent requested that the Supplemental EIS/PRMPA provide a detailed discussion of ambient air conditions, National Ambient Air Quality standards, and criteria pollutant non-attainment areas in all areas considered for solar development.
- One commenter stated that a Construction Emissions Mitigation Plan should be drafted and adopted in the Record of Decision.

CLIMATE CHANGE

- Specific concerns were expressed regarding climate change or climate fluctuation from the Project, and its effects on the migration of species through the corridor.
- Commenters stated each proposed alternative must consider the Project's impact with respect to global climate change.
- A respondent stated that the Supplemental EIS should consider how existing and/or proposed water sources for the Project may be affected by climate change.

CULTURAL AND HISTORIC RESOURCES

- Commenters expressed concern about preserving any archaeological and paleontological sites or artifacts found in the area.
- One respondent stated that the proposed Project and any new transmission lines could cause physical damage to artifacts and sites, expose cultural resources to looters, and increase fires due to soil disturbances and weed invasion that would place any existing cultural resources at risk of future damages.
- Commenters requested an archeological survey be performed in the Project area.
- One commenter requested that the Supplemental EIS/PRMPA describe the process and outcome of government-to-government consultation between the BLM and each of the tribal governments within the Project area, including issues that were raised and how those issues were addressed in the selection of proposed alternatives.

CUMULATIVE IMPACTS

 One commenter stated that the Supplemental EIS/PRMPA should provide a detailed review and analysis of the cumulative impacts of the proposed Project, and all associated infrastructure including roads and transmissions lines on the desert tortoise population.

- Commenters stated that a cumulative impacts analysis be conducted that considers consumptive uses—both in California and Nevada—such as grazing, Off-Highway Vehicle (OHV) activity, mining and the existing and other proposed projects in the surrounding area including the proposed Project, other renewable energy projects, gas and electrical transmission facilities, Desert Xpress Railroad (now XpressWest), the Kern River Gas Pipeline extension, and the Southern Nevada Supplemental Airport.
- A respondent stated that cumulative impacts need to be analyzed and considered in the context of various laws and regulations pertaining to management of public lands, including the Endangered Species Act, Federal Land Policy and Management Act, and BLM Manuals 6840 (Special Status Species Management), 6500 (Wildlife Habitat Management) and 4180 (Public Land Health).

ENVIRONMENTAL JUSTICE

• One commenter requested an evaluation of environmental justice populations within the geographic scope of the Project; and if such populations exist, the Supplemental EIS/PRMPA should address the potential for disproportionate adverse impacts to minority and low-income populations, and the approaches used to foster public participation by these populations.

GEOLOGY AND MINERAL RESOURCES

• One commenter stated that the Project area is in conflict with four active placer mining claims.

HAZARDOUS MATERIALS AND SOLID WASTE

- One commenter stated that the Supplemental EIS/PRMPA should disclose any potential toxic or hazardous wastes that may be associated with the Project during construction, operation, and maintenance, including pesticides and herbicides.
- A respondent requested that the Supplemental EIS/PRMPA include a plan for decommissioning and site restoration.

LAND USE

- One commenter stated that multiple land use must be maintained.
- A respondent stated that the Supplemental EIS/PRMPA should discuss how the Project would support or conflict with the objectives of federal, state, tribal, or local land use plans, policies, and controls in the Project area.

LIVESTOCK GRAZING

■ One commenter stated that the Supplemental EIS/PRMPA should include an assessment of the direct, indirect, and cumulative impacts of the Jean/Roach Lake and McCullough Mountains grazing allotments.

NOISE

 One commenter expressed concern that the Project would increase noise levels in Primm, Nevada.

NOXIOUS AND INVASIVE WEED CONTROL

- Commenters stated that the construction of access roads and transmission lines will lead to proliferation of invasive, non-native grasses and weeds, which will have negative impacts on fire management, soils, and, rare plants.
- One commenter stated that the Supplemental EIS/PRMPA should include an assessment of the direct, indirect, and cumulative impacts on the areas where Clark County funds have provided for weed monitoring and treatment activities, including the Interagency Weed Sentry Project.
- A commenter was concerned that the chemicals utilized to control noxious and invasive weeds will have negative impacts on the environment, species, and the watershed.
- A respondent requested that the Supplemental EIS/PRMPA include an invasive plant management plan to monitor and control noxious weeds.

PROJECT DESIGN

- Commenters asked about the need for a 13,000-acre ROW area when the project is only on 2,900 acres.
- Respondents expressed concern that historical OHV race routes will not be accessible with the proposed layout of the solar panels.
- One commenter stated that a portion of the ROW request impinges upon a site identified by the Clark County Department of Aviation as necessary for stormwater and flood control purposes to serve the Southern Nevada Supplemental Airport project.

PURPOSE AND NEED

- A commenter stated that the Purpose and Need statement should not simply indicate that the BLM is responding to an applicant's right of way application, as it has done for this and previous renewable energy projects.
- One respondent requested that the Purpose and Need statement be a clear, objective statement of the rationale for the Project; and should discuss the Project in the context of the larger energy market that the Project would serve.
- A commenter stated that the Supplemental EIS/PRMPA should clarify if the power generated by the Project would be delivered to the California or Nevada market and if a power-purchase agreement has been signed.

RECREATION

- Commenters had concerns about impacts to recreation in the area—specifically organized OHV races and other OHV uses.
- Commenters stated that recreational access to the area has been available to the public for decades and there was concern about future access.
- One commenter asked if the BLM would offer any mitigation for the loss of recreation.

SOCIAL AND ECONOMIC RESOURCES

- Commenters expressed concern over the economic impact to the Primm resorts and other nearby local businesses if the competitive OHV races lose access to racing routes located in the Project area.
- Commenters wanted more information on the economic impact to the tour companies that use the area for commercial tours on a daily basis.
- One commenter stated that the cost per kilowatt of solar power produced at the proposed Project makes it an irresponsible and costly experiment.

SOIL RESOURCES

A Respondent stated that soil erosion on low fill slopes and steeply graded areas could result in sedimentation of water bodies; and that changes in soil movements may impact rare plants and habitats for sensitive species.

SPECIAL DESIGNATION

- Commenters requested the Supplemental EIS/PRMPA address impacts to the 1994 Desert Tortoise Recovery Plan.
- One respondent voiced concern over the impact the Project will have on the ongoing Las Vegas BLM RMP revision, and stated the Project should be delayed pending completion of the RMP amendment.
- One commenter requested the Supplemental EIS/PRMPA fully review the impacts of each alternative on the nearby National Preserve and Wilderness areas.

SPECIAL STATUS SPECIES

- Commenters expressed concern over impacts to the desert tortoise from the construction and operation of the Project.
- A commenter stated that the continued fragmentation of desert tortoise habitat in this area
 of the Mojave Desert may pose a significant threat to the viability of the Northwest
 Mojave subpopulation of the desert tortoise.
- Commenters expressed concern about maintaining habitat connectivity at the landscape level to allow for self-sustaining desert tortoise populations.

- Respondents stated that there are a number of rare and sensitive plant species found in the area, and the Supplemental EIS/PRMPA should provide a detailed vegetation and wildlife map to facilitate public input.
- A commenter requested that the Supplemental EIS/PRMPA discuss mitigation ratios for tortoise habitat and how these relate to the mitigation ratios recommended by other agencies, as well as how they relate to mitigation ratios used for other renewable energy projects in California and Nevada.

TRAVEL MANAGEMENT AND OHV USE

- Commenters asked about impacts from the construction and operation of the Project to OHV use in the Project and nearby areas.
- Respondents voiced concerns over whether or not public access in the Project area will be maintained.
- One commenter stated that the Project area is perfect for OHV racing because the soil is sand and decomposed granite-based, unlike other areas that have a high alkali-based soils that cause dust and erosion.
- Multiple respondents stated that the Project area has been used for competitive OHV races for decades and there is concern over the ability of the OHV races and the Project to co-exist.
- A commenter stated that the Project area should not be open to OHV use because of the combined impacts from the Project and OHV use to the already heavily fragmented desert tortoise population.

VEGETATION RESOURCES

- One commenter expressed concern that sheet flooding on the Project site would have a negative impact on the vegetation down slope from the Project.
- A respondent stated that the Supplemental EIS/PRMPA should provide detailed vegetation maps to facilitate public input.

VISUAL RESOURCES

- Commenters stated that solar panels on the public lands above Primm will have a negative impact on the viewshed.
- A respondent stated that the Project will negatively impact the visual resources of Southern Nevada, which brings tourism and revenue to local communities.
- One commenter expressed concern regarding the visual resource impacts to the nearby Mojave National Preserve and designated Wilderness areas.
- Respondents were concerned with what mitigation efforts will be utilized to minimize the visual impact.

WATER RESOURCES

- Commenters expressed concerns about increased flood problems and requested that flood control evaluations are completed to demonstrate that no negative effects result from the Project.
- One commenter stated that the ROW application did not indicate the projected water demand during construction, and requested information on the source of water during construction, if it will be groundwater, quantity of water for the entire construction period, annual maximum extraction, and wellhead location.
- Respondents inquired about the quantity of water for the construction and operation period, annual maximum extraction, the source of water during construction, and the effects of groundwater pumping on the regional water reserves.
- One commenter asked about the depths of the wells needed for the Project.
- A respondent stated that the Supplemental EIS/PRMPA should include a jurisdictional delineation for all Waters of the United States (WOUS), including ephemeral drainages, in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and the December 2006 Arid West Region Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region.

WATERSHED RESOURCES

■ A commenter stated that the habitat impacted by each alternative should be evaluated and appropriate mitigations made for streambed alterations.

WILDLIFE RESOURCES

- Commenters stated the Project area is a known habitat for big horn sheep, elk, mule deer, coyotes, and multiple avian species, and requested the Supplemental EIS/PRMPA identify impacts the Project will have on these animals.
- One commenter requested that the Supplemental EIS/PRMPA analyze the risk to birds, including the golden eagle, by determining collision risks with the PV panels.
- Respondent's stated the Supplemental EIS/PRMPA should analyze all direct, indirect, and cumulative impacts to big horn sheep including loss of foraging habitat, impacts to linkage habitat, and loss of connectivity.
- A commenter stated that the Supplemental EIS/PRMPA should describe what measures will be taken to protect important wildlife habitat areas and to preserve linkages between them.

OTHER

Not all comments received during the scoping period are addressed in the Supplemental EIS/PRMPA. Non-substantive comments expressing general support or disapproval of the proposed Project fall outside of the scope of an EIS, or are otherwise not subject to

environmental analysis. Pursuant to NEPA regulations, the scope of an EIS includes the extent of the action, the range of alternatives, and the types of impacts to be evaluated (40 CFR 1508.25). Thus, comments that are not focused on the purpose and need of the proposed action, the proposed alternatives, the assessment of the environmental impacts of those alternatives, and the proposed mitigation are beyond the scope of the Supplemental EIS/PRMPA.

5.1.6 <u>Draft Supplemental EIS/PRMPA Circulation and Public</u> Meetings

The Draft Supplemental EIS/PRMPA review period was initiated by the publication of the Notice of Availability (NOA) for the Draft Supplemental EIS/PRMPA in the Federal Register on October 12, 2012, and the BLM published a NOA on October 15, 2012. Notice of the release of the Draft Supplemental EIS/PRMPA was also sent to those on the Project mailing list, which was developed from a list of agencies, organizations and individuals who requested information during and after the scoping period. Copies of the Draft Supplemental EIS/PRMPA were sent to those who requested them and the document was made available on the following BLM website:

http://www.blm.gov/nv/st/en/fo/lvfo/blm_programs/energy/Silver_State_Solar_South.html

During the comment period, three public meetings to solicit input on the Draft Supplemental EIS/PRMPA were held as follows: 1) December 4, 2012 at the Primm Valley Resort and Casino, Primm, NV; 2) December 5, 2012 at Renaissance Hotel, Las Vegas, NV; and 3) December 6, 2012 at the Jean Airport, Jean, NV. These meetings were advertised in advance on the Project website and in two area newspapers: the Las Vegas Review Journal and the Pahrump Valley Times. In addition, the public were invited to submit their comments through BLM's web site, by mail, e-mail, or facsimile.

The 90-day public comment period on the Draft Supplemental EIS/PRMPA ended January 11, 2013. A total of 380 comment letters and oral comments were received.

5.1.7 <u>Final Supplemental EIS/PRMPA and Administrative</u> <u>Remedies</u>

The BLM reviewed all comments received on the Draft Supplemental EIS/PRMPA and developed responses to all substantive comments based on guidance found in the CEQ regulations (40 CFR 1503.4). The responses to substantive comments are provided in Appendix D, which contains: 1) a list of all individuals, agencies, and organizations that provided written comments on the Draft Supplemental EIS/PRMPA; 2) common responses to comments that raised similar issues or environmental concerns; and 3) individual responses to comments. The Draft Supplemental EIS/PRMPA was modified as needed based on the responses to comments during the preparation of the Final Supplemental EIS/PRMPA. The CEQ regulations at (40 CFR 1503.4) recognize several options for responding to substantive comments, including:

• modifying one or more of the alternatives as requested.

- developing and evaluating suggested alternatives.
- supplementing, improving, or modifying the analysis.
- making factual corrections.
- explaining why the comments do not warrant further agency response, citing cases, authorities, or reasons to support the BLM's position.

The BLM and EPA's Office of Federal Activities will publish NOAs for the Final Supplemental EIS/PRMPA in the Federal Register when the document is ready to be released to the public. The NOA (to be published by EPA in the Federal Register) will initiate a 30-day protest period on the proposed RMP amendments to the Director of the BLM in accordance with 43 CFR 1610.5-2. In addition, the BLM land use plan amendment process includes a 60-day governor's consistency review as set forth in 43 CFR 1610.5-2. The 30-day protest period and the 60-day governor's consistency review will run concurrently following publication of the NOA in the Federal Register. After any protests have been resolved, the BLM may publish an Approved Plan Amendment and a ROD on the Project application. After any protests have been resolved, the BLM will publish a ROD that will present the BLM's decision on the Project and plan amendment.

5.2 CONSULTATION AND AGENCY COORDINATION

5.2.1 Cooperating Agencies

Cooperating agency status provides a formal framework for governmental agencies to engage in active collaboration with a federal agency to implement the requirements of NEPA (42 USC 4321, et seq.). Federal and state agencies and local and tribal governments may qualify as cooperating agencies because of "jurisdiction by law or special expertise" (40 CFR 1501.6 and 1508.5).

On November 23, 2011, the BLM Southern Nevada District Office sent an invitation to federal, state, and local agencies to be cooperating agencies for the Silver State Solar South Supplemental EIS/PRMPA and the Hidden Hills Transmission Project EIS. This letter requested agencies to indicate via written letter if they were interested in becoming a cooperating agency for either of the two projects. The following agencies were invited to participate as cooperating agencies for the Silver State Solar South Supplemental EIS/PRMPA and the Hidden Hills Transmission Project EIS:

- Advisory Council on Historic Preservation
- Army Corps of Engineers
- Bureau of Reclamation, Lower Colorado Regional Office
- City of Boulder City

- City of Henderson
- City of Las Vegas
- City of Mesquite
- City of North Las Vegas
- Clark County
- Clark County Regional Flood Control District
- Clark County Department of Aviation
- Department of Defense
- Department of Energy, Loan Guarantee Program Office
- Federal Aviation Administration
- Federal Aviation Administration, Western Pacific Region Airport Division
- National Nuclear Security Administration
- National Park Service, Death Valley National Park
- National Park Service, Lake Mead National Recreation Area
- Nellis Air Force Base
- Nevada Department of Mines
- Nevada Department of Transportation
- Nevada Department of Wildlife
- Nye County
- Nye County Board of County Commissioners
- Nye County Nuclear Waste Repository Project Office
- Southern Nevada Water Authority
- United States Department of Transportation, Federal Highway Administration
- United States Environmental Protection Agency
- United States Fish and Wildlife Service

■ United States Geological Survey

As of <u>July 17, 2013</u>, the United States Environmental Protection Agency, Clark County Department of Aviation, National Park Service (Mojave National Preserve), <u>NDOW</u>, <u>and USACE accepted cooperating agency status</u>. The City of North Las Vegas, the USGS, and the USFWS have declined cooperating agency status. The BLM invited the Advisory Council on Historic Preservation to participate in this Project, <u>but they declined</u> via correspondence <u>received</u> on October 17, 2012.

5.2.2 Native American Consultation

In accordance with Section 106 of the NHPA, the lead federal agency and cooperating federal agencies are required to consider the effects of the agencies' undertakings on properties listed in or eligible for the National Register of Historic Places. Eligible properties can include a diversity of archaeological, historical, and traditional cultural resources. The Protection of Historic Properties (36 CFR 800) implement Section 106 and define a process for federal agencies to use in consulting with State Historic Preservation Officers and other interested parties as they assess the effects of their undertakings.

In recognition of the special relationship with the United States Government, the BLM consults with the appropriate tribal governments at an official, executive-level (government-to-government), in accordance with the NHPA. The BLM provides opportunities for government officials of federally recognized Native American tribes to comment on and participate in the preparation of the Supplemental EIS/PRMPA. The BLM will consider comments, notify consulted tribes of final decisions, and inform them of how their comments were addressed in those decisions. At a minimum, officials of federally recognized tribal governments will be offered the same level of involvement as state and county officials. Pursuant to the regulations, on August 16, 2011 the BLM mailed letters to three representatives of the Las Vegas Paiute Tribe, three representatives of the Moapa Band of Paiutes, two representatives of the Chemehuevi Indian Tribe, two representatives of the Fort Mojave Indian Tribe, two representatives of the Colorado River Indian Tribes, and one member of the non-federally recognized Pahrump Paiute. The tribes were invited to share information or any cultural concerns regarding the proposed Project area.

Through in-person meetings and telephone conversations with the Las Vegas Tribe, the Chemehuevi Tribe, and the Fort Mojave Tribe, no concerns have been expressed for the proposed Project. The Moapa tribe and the Pahrump tribe (a non-federally recognized tribal entity) raised a concern regarding how the tortoise habitat would be affected and the potential use of groundwater within the Project. The Colorado River Indian Tribes stated on September 6, 2012 that they would send a response to the BLM stating what their concerns might be but a response was not received. There are no known sites of religious or ceremonial importance to the tribes within the ROI for the Project.

5.2.3 Endangered Species Act Section 7 Consultation

The USFWS has jurisdiction to protect threatened and endangered species under the ESA (16 U.S.C. Section 1531 et seq.). Formal consultation with the USFWS under Section 7 of the ESA is required for any federal action that may adversely affect a federally-listed species. This consultation is initiated through a request by the BLM to initiate formal consultation and the submittal of a Biological Assessment (BA). Following review of the BA and impacts of the Proposed Action, the USFWS would be expected to issue a Biological Opinion (BO) that specifies mitigation measures that must be implemented for any protected species.

On March 4, 2013, the USFWS sent a memorandum requesting the batching of two requests for formal consultation under ESA Section 7: First Solar's Stateline Solar Farm Project received on January 4, 2013, and First Solar's Silver State South Project received on February 11, 2013. At issue for ESA Section 7 consultation are the effects of the proposed actions on the federally threatened desert tortoise (Gopherus agassizzi). The Service reasoned due to 1) proximity of the projects, 2) timing of the consultations, 3) similarity between the effects of the projects, and 4) need to comprehensively address impacts to habitat and connectivity in the North East Recovery Unit, conservation of the desert tortoise in Ivanpah Valley was best addressed by batching these projects instead of approaching the requests for consultation separately. The BLM agreed with the request to batch the consultations, and the USFWS accepted a BA for each of the two projects. Consultation officially began on March 12, 2013, and BLM received a Draft BO on September 11, 2013. The batched BO addresses impacts to habitat and connectivity comprehensively for the Ivanpah Valley. Within the BO, BLM requested two project-specific incidental take permits associated with applicable Terms and Conditions and conservation measures to ensure clarity in agency and applicant responsibility.

The BLM Preferred Alternative was developed by the Applicant through close consultation with the USFWS, BLM, and USACE to reduce impacts to the desert tortoise and jurisdictional waters. During this consultation, the Applicant developed iterations of a revised Project layout which were reviewed by USFWS, BLM and USACE and refined based on agency feedback.

5.3 NAMES OF PREPARERS

The following individuals participated in the preparation and review of this Supplemental EIS/PRMPA:

Name	Responsibility	
BLM – Las Vegas Field Office		
Bob Ross	Field Manager	
Greg Helseth	Renewable Energy Project Manager, Public Involvement	
Nancy Christ	Planning and Environmental Coordinator	
John Evans	NEPA Coordinator, Social and Economic Conditions, Environmental Justice	
Mark Chandler	Lands and Realty, Visual Resources, Special Management Areas	
Brenda Wilhight	Lands and Realty, Visual Resources	
Lisa Christianson	Air Quality and Climate	
George Varhalmi	Energy and Minerals, Geology	
Kathleen Sprowl	Cultural and Native American Resources, Paleontological Resources	
Boris Poff, PhD	Water Resources and Floodplains, Soils	
Jayson Barangan	Biological Resources	
Mark Slaughter	Biological Resources	
Bob Dieli	Recreation	
Marilyn Peterson	Recreation	
Shonna Dooman	Recreation	
Mike Moran	Human Health and Safety/ Hazardous Materials	
AMEC Environment & Infrastructure		
Aaron Goldschmidt	Principal-in-Charge	
Michael Henry, PhD	Deputy Project Manager	
Doug McFarling	Quality Assurance	
Rita Bright	Visual Resources	
Andrew Chen	Soils, Fuels and Fire Management, Transportation/Motor Vehicle Access	
Shannon Moy	Cumulative Impacts	
Morgan Aagesen	GIS and Mapping	

Name	Responsibility		
EPG			
Sandra Fairchild	Senior Project Manager/NEPA Advisor		
Newton Debardeleben	Deputy Project Manager		
Andrew Roether	Land Use, Recreation, Special Management Areas		
Alison Pruett	Biological Resources		
Marc Schwartz	Visual Resources		
Rebecca Halbmaier	Cultural and Native American Resources		